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10 Attorneys for Plaintiff
11 United States of America

12
13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 PAULO ALFONSO PEREZ-MENDOZA,
19 Defendant.

20 CASE NO. 2:24-CR-00073 DC
21 SECOND AMENDED STIPULATION
22 REGARDING EXCLUDABLE TIME PERIODS
23 UNDER SPEEDY TRIAL ACT; FINDINGS AND
24 ORDER

25
26 STIPULATION

- 27 1. By previous order, this matter was set for status before this Court on April 18, 2025.
28 2. By this stipulation, the parties now move to reset the status conference for August 22, 2025, and to exclude time between April 18, 2025, and August 22, 2025, under Local Code T4.
29 3. The parties agree and stipulate, and request that the Court find the following:
30 a) The government has represented that the discovery associated with this case includes 21,054 Bates Stamped pages of material, including recordings, cell phone extractions, and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
31 b) The parties have been discussing whether a resolution is possible in this case. On April 11, 2024, the government communicated a plea offer to the defendant. That offer expired on February 3, 2025. A new plea offer with different terms was extended on April 8, 2025.

1 c) Counsel for the defendant desires additional time to review the discovery
2 material, conduct further investigation, and consider the government's April 8, 2025, plea offer.

3 d) Counsel for defendant believe that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation,]taking
5 into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of April 18, 2025 to August 22, 2025,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
13 because it results from a continuance granted by the Court at defendant's request on the basis of
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest
15 of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

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1 IT IS SO STIPULATED.

2 Dated: April 10, 2025

3 MICHELE BECKWITH
4 Acting United States Attorney

5 /s/ KAREN A. ESCOBAR
6 KAREN A. ESCOBAR
7 Assistant United States Attorney

8 Dated: April 10, 2025

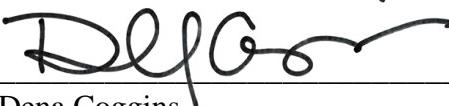
9 /s/ Meghan McLoughlin
10 Meghan McLoughlin
11 Counsel for Defendant
12 Paulo Alfonso Perez-Mendoza

13 **ORDER**

14 **IT IS HEREBY ORDERED** that the Status Conference scheduled for April 18, 2025, at 9:30
15 a.m. is VACATED and RESET for August 22, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable
16 Dena M. Coggins. The time period between April 18, 2025 and August 22, 2025 inclusive, is excluded
17 under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4], as the ends of
18 justice served by granting the continuance outweigh the best interest of the public and the defendants in
19 a speedy trial.

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23 IT IS SO ORDERED.

24 Dated: April 10, 2025

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26 Dena Coggins
27 United States District Judge